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**Pro hac application pending*

Attorneys for Richard Bruce and Ronald Olbrysh

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al*,

Debtors.

Case No: 18-23538 (RDD)

Chapter 11

(Jointly Administered)

**SEARS RETIREES' JOINDER OF SECRETARY OF LABOR'S
LIMITED OBJECTION TO THE DISCLOSURE STATEMENT
FOR JOINT CHAPTER 11 PLAN OF SEARS HOLDINGS
CORPORATION AND ITS AFFILIATED DEBTORS**

**TO: THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE**

Sears Roebuck retirees, Richard Bruce ("Bruce") and Ronald Olbrysh ("Olbrysh" and together with Bruce, the "Retirees"), hereby join the May 8, 2019 limited objection of the Secretary (the "Secretary") of the United States Department of Labor (the "DOL") to the Disclosure Statement (the "Disclosure Statement") for the Joint Chapter 11 Plan of Sears Holdings Corporation and Its Affiliated Debtors (Dkt. 3759), filed by the above-

captioned debtors and debtors-in-possession (collectively, the “Debtors”), as amended on May 16, 2019 (the “Amended Disclosure Statement”) (Dkt. 3895).

The Retirees have also filed a Motion Pursuant To Section 1114(d) of the Bankruptcy Code Directing the Appointment of a Committee of Retired Employees (Dkt. 4054) (the “Motion”) seeking the appoint of a committee of Sears retirees as the Debtors have indicated in the proposed Amended Disclosure Statement that they intend to disregard their obligations to retirees under Section 1114 of the Bankruptcy Code, 11 U.S.C. § 1114.

WHEREFORE, for the reasons set forth in the Secretary of the DOL’s objection, the Retirees respectfully request that the Court deny approval of the Amended Disclosure Statement and grant such other and further relief as is just and proper.

New York, New York
May 28, 2019

Respectfully submitted,

By: /s/ James N. Lawlor

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